

## **EXHIBIT B**

RECEIVED

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

IN RE: APPLICATION OF THE UNITED  
STATES OF AMERICA FOR ORDER  
PURSUANT TO 18 U.S.C. § 2703(d)

**UNDER SEAL**

Case No. 1:19-ec-1275

**SUPPLEMENTAL DECLARATION OF STEPHANIE S. ABRUTYN IN SUPPORT OF  
OPPOSITION TO GOVERNMENT'S MOTION FOR RECONSIDERATION**

I, Stephanie S. Abrutyn, hereby declare under penalty of perjury:

1. I am Senior Vice President & Chief Counsel, Litigation and Public Policy, WarnerMedia. In that role, I lead the team responsible for overseeing and managing litigation for Warner Media, LLC ("Warner Media") and its subsidiaries and brands, including CNN and the Turner networks. Among other things, my team responds to certain government requests for information and other forms of compulsory process.
2. Warner Media was served with the above-referenced Order on July 17, 2020.
3. The Order compels the production of information during the period of June 1, 2017, to July 31, 2017 from the email account of Barbara Starr ("the account"), a veteran national security and defense reporter currently employed as a journalist for CNN.
4. The Order would compel the production of information related to 34,347 emails from Ms. Starr's account ("the emails"). Of those, over 26,000 are emails that consist solely of internal communications among journalists working for CNN or Warner Media personnel.
5. Thousands of emails covered by the Order were sent to or from email domains owned and controlled by the U.S. government, such as .mil and .gov email accounts.
6. The vast majority of the 34,347 emails appear to be business related, in connection with Ms. Starr's role as a reporter for CNN.

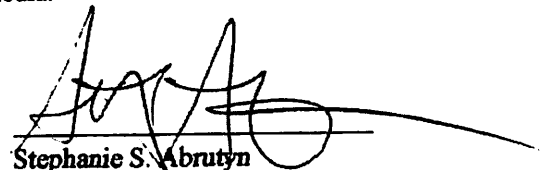
7. During the time period at issue in the Order, June 1, 2017, to July 31, 2017, Ms. Starr published 53 articles. The articles are attached as **Exhibit 1**. The articles cover a variety of topics, with headlines that include:

*Russian jet intercepts US B-52 bomber*  
*Trump appears to take credit for Gulf nations' move against Qatar*  
*US-led coalition strikes pro-Syrian regime forces*  
*Pentagon says US now has ability to shoot down ICBMs*  
*Exclusive: Inside the rarely-acknowledged missions of two Navy SEALs killed in action*  
*US forces attacked in Afghanistan*  
*Mattis confirms White House has given him authority to set Afghanistan troop levels*  
*Missing sailors found dead in flooded compartments on US Navy destroyer*  
*First on CNN: US shoots down another pro-regime drone in Syria*  
*US spy satellites detect activity at North Korean nuclear test site*  
*US, Iraq say ISIS blew up famous Mosul mosque*  
*Trump comes close to finding his red line in Syria*  
*US official: No more chemical weapons activity observed at Syrian airbase*  
*Why the US military is delaying announcing Afghanistan combat deaths*  
*US to test THAAD missile defense system*  
*Is ISIS leader Baghdadi dead or alive? Nobody knows*  
*Chinese spy ship lurks off coast of Alaska during missile defense test*  
*Medal of Honor recipient's gesture stuns brigade*  
*Initial investigation blames Navy for USS Fitzgerald collision*  
*Brennan: Officials should refuse to fire Mueller if asked to by Trump*  
*Friendly fire strike by US kills 16 Afghan police, officials say*  
*US General confirms ending of program to arm anti-Assad rebels in Syria*  
*Chinese fighter jet performed 'unsafe' intercept of US Navy plane*  
*How McMaster is being undercut in and outside the White House*  
*US Joint Chiefs blindsided by Trump's transgender ban*  
*Marines ground KC-130T planes after deadly crash*  
*Trump condemns North Korean long-range missile launch*

8. During the time period at issue in the Order, June 1, 2017, to July 31, 2017, Ms. Starr appeared in her professional capacity on television or radio more than 150 times. The appearances covered a

wide variety of topics, including those covered in Ms. Starr's articles and others.

9. The Order calls for Warner Media to disclose the email address of every source and every colleague with whom Ms. Starr communicated by email during the period of June 1, 2017, to July 31, 2017.
10. Disclosing the requested information would give the government a "birds eye" view into the editorial process of Ms. Starr and CNN, generally. The government could take the publication date and time of every article or television appearance during that two-month period and work backwards to map communications that likely relate, or it could take an email to or from a particular source to map Ms. Starr's communications going forward.
11. In addition, numerous internal email addresses also disclose, at least in part, the substance of certain communications because CNN and other Warner Media subsidiaries use topic-based internal distribution email lists. Approximately ten thousand emails covered by the Order appear to relate to internal distribution lists within CNN or Warner Media, many of which reflect the content or subject matter of the communications in the distribution list alias itself. Disclosing information related to those communications would therefore also disclose the topics covered by Ms. Starr's communications within CNN and Warner Media.



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